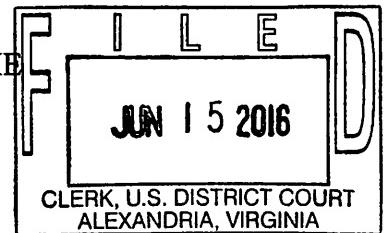


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
)
)
v.) Case No. 1:16-mj-261
)
)
QUINCY RAMIN ALGHOJEH,)
)
)
Defendant.)
)

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Stephen Schneider, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for QUINCY RAMIN ALGHOJEH.
2. Your affiant submits that the evidence described in this affidavit establishes probable cause to believe that on or about June 14, 2016, in Loudoun County, Virginia, within the Eastern District of Virginia, QUINCY RAMIN ALGHOJEH, with intent to evade a currency reporting requirement under 31 U.S.C. § 5316, did knowingly conceal more than \$10,000 in U.S. Currency, to wit: approximately \$113,729, on the person of such individual and in a conveyance, article of luggage, merchandise, or other container, and attempted to transport and transfer such currency from a place in the United States to a place outside the United States, in violation of Title 31, United States Code, Section 5332.
3. All information in this affidavit is either personally known to me, has been related to me by other law enforcement officers, or has been related to me by records and documents

gathered during this investigation, as noted. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the government. The inferences and conclusions I draw from the evidence that are included in this affidavit are what I believe based on my training, experience, and knowledge of the investigation.

AGENT BACKGROUND

4. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18, United States Code.

5. I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI). I am assigned to the Washington Dulles International Airport. My duties as a Special Agent with HSI include, but are not limited to, the investigation of federal laws governing the importation and exportation of controlled substances. I have received training in general law enforcement, including training in Title 21 of the United States Code. I am a graduate of the Federal Law Enforcement Training Center at Glynco, Georgia.

PROBABLE CAUSE

6. On or about June 14, 2016, ALGHOJEH prepared to depart Dulles International Airport, in Loudoun County, Virginia, within the Eastern District of Virginia, on Austrian Airline flight #94, with his final destination being Tehran, Iran.

7. Two Customs and Border Protection (CBP) officers approached ALGHOJEH while he was on the jetway preparing to board his flight and asked ALGHOJEH to identify the amount of currency in his possession.

8. The CBP officers advised ALGHOJEH that the law required individuals carrying in excess of \$10,000 in U.S. currency and departing the United States to submit a currency declaration identifying the value of currency in their possession, and that failure to do so was a violation of law. The CBP officers also presented ALGHOJEH with CBP Publication No. 0000-0503, a form explaining the currency reporting requirement.

9. ALGHOJEH stated to the two CBP officers that he (ALGHOJEH) was carrying approximately \$4,000. ALGOJEH also wrote “4,000” on the back of the CBP Publication No. 0000-0503 form and initialed it.

10. When asked to verify the amount that he was transporting, ALGHOJEH retrieved a folder from the backpack he was carrying, which contained \$4,000 in U.S. currency, and he presented that amount to the CBP officers.

11. The two CBP Officers then conducted a search of ALGHOJEH’s backpack and discovered additional U.S. currency. The backpack contained a total of \$113,729 in U.S. currency.

12. Records checks revealed a 2007 FINCEN report identifying ALGHOJEH as having declared \$260,000 in U.S. currency when traveling from a place in the United States to a place outside the United States.

CONCLUSION

13. Based on the foregoing, your affiant submits there is probable cause to believe that on or about June 14, 2016, in Loudoun County, Virginia, within the Eastern District of Virginia, QUINCY RAMIN ALGHOJEH, with intent to evade a currency reporting requirement under 31 U.S.C. § 5316, did knowingly conceal more than \$10,000 in U.S. Currency, to wit: approximately \$113,729, on the person of such individual and in a conveyance, article of

luggage, merchandise, or other container, and attempted to transport and transfer such currency from a place in the United States to a place outside the United States, in violation of Title 31, United States Code, Section 5332.

14. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Stephen Schneider
Special Agent
U.S. Department of Homeland Security

Sworn and subscribed to me this 15th day of June, 2016.



/s/
Ivan D. Davis
United States Magistrate Judge